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November 9, 2020

**By ECF**

The Honorable Gregory H. Woods  
United States District Court  
Southern District of New York  
500 Pearl Street, Room 2260  
New York, NY 10007

*Cardwell v. Davis Polk & Wardwell LLP, et al.*  
19-cv-10256-GHW (S.D.N.Y.)

Dear Judge Woods:

Further to the November 4, 2020 pre-motion conference in the above-captioned matter, Defendants respectfully enclose copies of the Joint Letter and exhibits filed September 29, 2020 (ECF 75) bearing redactions reflecting the Court's November 4 Order (ECF 82).

Plaintiff disputes that the redactions are consistent with the Court's November 4 Order. Specifically, Plaintiff disagrees that page 3 of Exhibit A is narrowly tailored, or that the redactions on pages four and five are covered by attorney-client privilege. Thus, Plaintiff has added a footnote on pages four and five indicating a reservation of rights to use non-attorney-client privileged documents according to applicable rules and to challenge any similarly impermissible redactions in the future.

Respectfully submitted,

/s/ Susanna M. Buergerl

Susanna M. Buergerl

Attachments

cc: All Counsel of Record (via ECF)